

**Ejike Esobe**

1

Volume: 1  
Pages: 1-33  
Exhibits: None

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**Case No. 15-CV-00280-PB**

- - - - - x

**JONATHAN LEITE,**

**Plaintiff,**

**v.**

**MATTHEW GOULET, et al.,**

**Defendants.**

- - - - - x

**DEPOSITION OF EJIKE ESOBE**

**September 20, 2017**

**10:23 a.m. to 11:05 a.m.**

**NORTHERN NH CORRECTIONAL FACILITY**

**138 East Milan Road**

**Berlin, New Hampshire**

**Reporter: Celeste A. Quimby, LCR No. 17**

23

4

1 EJIKE ESUBE  
2 having been duly sworn by the reporter,  
3 was deposed and testified as follows:  
4 **EXAMINATION**  
5 **BY MR. KING:**  
6 Q. Okay. Please state your name for the  
7 record.  
8 A. My name is Mr. Ejike Esobe.  
9 Q. And who is your current employer?  
10 A. Now?  
11 Q. Yes.  
12 A. Well, I have my own business. I do  
13 vacation rentals.  
14 Q. For a period of time were you employed at  
15 the Northern New Hampshire Correctional Facility?  
16 A. For a period of what?  
17 Q. Time.  
18 A. That is less than a year.  
19 Q. When were you employed at the Northern  
20 New Hampshire Correctional Facility?  
21 A. 2012, if I remember. I don't remember  
22 everything. It's been a long time. I --  
23 sometimes I need papers to remember. So for I

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23

1 think 2012.  
2 Q. Have you ever worked at any other  
3 correctional facility?  
4 A. No.  
5 Q. When you began working at the Northern  
6 New Hampshire Correctional Facility, what was your  
7 title?  
8 A. Correctional officer.  
9 Q. Do you remember to whom you reported?  
10 A. No, I don't remember people's names.  
11 It's been a very long time, so...  
12 Q. Did you receive any training in  
13 performing correctional officer duties?  
14 A. Yes.  
15 Q. Where did you receive that training?  
16 A. Concord, and I received a little bit of  
17 training here before getting training in Concord.  
18 Q. Did you attend something called a  
19 corrections academy in Concord?  
20 A. Yes, that's what -- the one I'm talking  
21 about, the academy.  
22 Q. Do you remember when you attended the  
23 academy?

<p style="text-align: right;">Page 6</p> <p>1 A. Can't. Not good with dates because it's 2 very, very -- it's been a long time. 3 Q. Certainly. 4 A. But, yeah, it's 2012. 5 Q. For how long did you attend corrections 6 academy? 7 A. Nine weeks. 8 Q. Nine weeks? 9 A. Sure. 10 Q. When you attended corrections academy, 11 did you receive any training on doing rounds? 12 A. Yes. 13 Q. Tell me what you recall of the training 14 that you received in doing rounds. 15 A. When I started, I started with following 16 an officer here that showed me how to do it. I 17 asked questions as well. And we look out for 18 something that is not supposed to be there. Maybe 19 if we can see blood droppings or anything that is 20 wrong, then we can take care of it. It's usually 21 short rounds. There's no -- you know. 22 Q. I'm sorry, I missed what you said. 23 Usually what?</p>	<p style="text-align: right;">Page 8</p> <p>1 whole training as a correctional officer. 2 Q. Now, when you were employed as a 3 corrections officer here at the Northern New 4 Hampshire Corrections Facility, did you do rounds 5 as part of your job duties? 6 A. Yes, just for a very short time because 7 I stayed here -- I worked here for like less than 8 a year. Perhaps most of the time I followed some 9 officers, so I was learning how to do it. 10 Q. In the blocks in which you did rounds, 11 some inmates were assigned to cells and some 12 inmates were assigned to bunks in the dayroom; is 13 that correct? 14 A. Yeah, that's correct. 15 Q. When you were doing rounds during the 16 day, would you check the bunks in the dayroom? 17 A. Yes, we do look into the bunks and, yeah, 18 we check the bunks, and what we look for is if -- 19 like I said before, if something is not right, 20 then we can take care of it. That's what we do 21 when we do rounds. 22 Q. When you were doing rounds during the 23 day, how would you go about checking the upper</p>
<p style="text-align: right;">Page 7</p> <p>1 A. Short rounds, like is the rounds like we 2 go every day, every -- every one hour or 3 something. I don't know how -- it might have 4 changed now. But we do it every one hour, is 5 like, yeah, we do a round, yes. That's what we do 6 for rounds. 7 Q. Okay. 8 A. It's kind of like patrol. 9 Q. When you received training in doing 10 rounds, did you learn that while doing rounds you 11 should look in every single cell? 12 A. We do that as well. I might not remember 13 all of it now because I'm not in that field now. 14 But, yeah, it comes to me, you know, as we go 15 as -- if I -- yeah, if somebody can mention it, 16 then I will remember, yeah. 17 Q. When you attended the corrections 18 academy, Mr. Esobe, were you provided any written 19 materials as part of your training? 20 A. In the academy? 21 Q. Yes. 22 A. Yes. We had written materials and 23 everything. Walked right in. I received the</p>	<p style="text-align: right;">Page 9</p> <p>1 bunks in the dayroom? 2 A. You just -- because you're just walking 3 by it, you just look through it and observe, and 4 if something is wrong, like I said before, then 5 you take care of it. 6 Q. Where there were bunks in the dayroom, 7 there were -- strike that. Where there were bunks 8 in the dayroom, there was an upper bunk and a 9 lower bunk joined together; is that correct? 10 A. If I can remember. I don't remember that 11 now. It's been very, very long. 12 Q. All right. When you were doing rounds of 13 blocks where there were bunks in the dayroom, were 14 you able to see what was on the upper bunk? 15 A. Yeah. As an officer, yeah, that's what 16 we do. We look, check upper one, down one; look 17 into the cells. We look pretty much everywhere, 18 looking for stuff that is wrong, so we can take 19 care of it. That's why we're doing rounds. 20 Q. When you were a corrections officer 21 working here at the Northern New Hampshire 22 Correctional Facility, did you ever do rounds of 23 F block?</p>

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1 A. We -- yeah. Yes, I did rounds in F block  
2 with some other officers.  
3 Q. Now, if you walked into F block through  
4 the door through which correctional officers  
5 entered onto the block.  
6 A. Yeah.  
7 Q. To your right there was a public -- or  
8 there was a common bathroom and there was a mop  
9 closet; is that right?  
10 MS. CUSACK: Objection to form. Go  
11 ahead.  
12 A. I don't remember all that. I don't even  
13 remember how the cells look like now. It's been  
14 very long.  
15 Q. That's fine. Do you remember when you  
16 were doing rounds here at the Northern New  
17 Hampshire Correction Facility looking into common  
18 bathrooms and mop closets?  
19 MS. CUSACK: Objection to form. Go  
20 ahead.  
21 A. Like I said before, we checked  
22 everything. We checked everything when we do  
23 rounds, making sure everything -- leaving that

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1 facility in good hands, to come back in one hour  
2 time to do the same thing.  
3 Q. When you were a corrections officer  
4 working here at the Northern New Hampshire  
5 Correctional Facility, did you ever detect fights  
6 or assaults that needed to be broken up?  
7 A. No.  
8 Q. No?  
9 A. Something like that happen, but I was --  
10 wasn't in a position to dictate it. So, yeah, I  
11 wasn't -- probably different, how do you say it,  
12 department. But I will hear it when it happens,  
13 but I didn't dictate to any.  
14 Q. Okay. Okay.  
15 A. I didn't dictate to any since I worked  
16 here.  
17 Q. Now, in addition to doing rounds when you  
18 worked here as a corrections officer at the  
19 Northern New Hampshire Correctional Facility, did  
20 you also work in CP-5 monitoring video screens?  
21 MS. CUSACK: Objection to form. Go  
22 ahead.  
23 A. I worked in some bubbles. You know, they

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1 were training me about how to do the control  
2 rooms, how to work the control rooms, yeah.  
3 Q. Okay. When you were assigned to work in  
4 the control room, what would you do?  
5 A. There's a lot in control rooms. There's  
6 more responsibilities in there. You pop the doors  
7 like open, and sometimes calls comes in and you  
8 answer calls, and you make announcements. And  
9 then you watch through the camera. And each  
10 facility have bunch of cameras you play with, like  
11 camera one, camera two, camera three. You have to  
12 make sure you look on those cameras every few  
13 seconds, looking for stuff. That's what we do in  
14 the control room.  
15 Q. So when you were working in CP-5, you had  
16 a monitor screen on which you could observe  
17 activity in E block, F block, G block or H block,  
18 right?  
19 A. Sorry, I didn't hear that. Come back --  
20 I didn't understand the question.  
21 Q. When you were working in CP-5.  
22 A. Yeah.  
23 Q. One of your job responsibilities was to

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1 watch a monitor screen --  
2 A. Yeah.  
3 Q. -- that showed activity in one of four  
4 different housing blocks: E block, F block, G  
5 block or H block. Right?  
6 MS. CUSACK: Objection to form. Go  
7 ahead.  
8 A. I can't remember that. But, yeah, we  
9 watch -- we watch monitor cameras, yes. I can't  
10 remember how many, how it's connected now, but --  
11 Q. Certainly.  
12 A. -- we watch cameras, yes. Yeah.  
13 Q. And if I understand your testimony  
14 correctly, every few seconds you were to change  
15 the video screen so you were watching activity in  
16 a different housing block; is that right?  
17 A. Yes, correct. That way, you can see  
18 other things going. You can't just stay or pause  
19 the camera in one place for so long because you're  
20 going to miss something, if something happening on  
21 camera two while you were busy for a person on  
22 camera one. So you just have to move it around.  
23 That's how I was trained, to move it around. That

<p style="text-align: right;">Page 14</p> <p>1 way, you can catch something happening by accident</p> <p>2 or by, yeah, checking through it, yeah.</p> <p>3 Q. And who provided you that training?</p> <p>4 A. Every day there is -- there will be the</p> <p>5 officer assigned to me as the officer that I will</p> <p>6 follow around that will train me on some stuff.</p> <p>7 And after, they can swap me with a different</p> <p>8 officer, so I don't really know who assigned those</p> <p>9 officers to me.</p> <p>10 Q. Fair enough.</p> <p>11 A. I couldn't remember.</p> <p>12 Q. Did you receive training on monitoring</p> <p>13 inmates via video when you attended the</p> <p>14 corrections academy?</p> <p>15 A. I received all kinds of training there at</p> <p>16 the academy. And I'm sure, if I remember</p> <p>17 correctly, as one of them, we watched monitor</p> <p>18 cameras and stuff, all kinds of -- before we start</p> <p>19 the job here, we did all kinds of stuff in</p> <p>20 academy.</p> <p>21 MR. KING: Okay. Why don't we show Mr.</p> <p>22 Esobe the video.</p> <p>23 MS. DOUGLASS: Okay. Do you want this</p>	<p style="text-align: right;">Page 16</p> <p>1 A. All right.</p> <p>2 Q. And each set of bunks contains an upper</p> <p>3 bunk and a lower bunk; is that right?</p> <p>4 A. Yeah, correct. The one I'm seeing like</p> <p>5 is not very -- I can't say if he's up and down.</p> <p>6 Looks like one. But, yeah, you are right.</p> <p>7 Q. All right. And when you were working at</p> <p>8 the correctional facility in 2012, was it the case</p> <p>9 that for each of these sets of bunks, one inmate</p> <p>10 would be assigned to the lower bunk and another</p> <p>11 inmate would be assigned to the upper bunk?</p> <p>12 MS. CUSACK: Objection to form. Go</p> <p>13 ahead.</p> <p>14 A. Sometimes there's only one inmate.</p> <p>15 Sometimes there's two of them.</p> <p>16 Q. Understood. And when you were doing</p> <p>17 rounds of such a block as this F block, is it your</p> <p>18 testimony that by walking past the -- strike that.</p> <p>19 When you were doing rounds of a block</p> <p>20 such as this in 2012, would you walk past bunks</p> <p>21 such as these in the dayroom?</p> <p>22 A. Yeah. Not just walking past it. We</p> <p>23 check and we look in it. Yeah, we look in it</p>
<p style="text-align: right;">Page 15</p> <p>1 perspective or the other one?</p> <p>2 MR. KING: Off the record.</p> <p>3 (Discussion off the record.)</p> <p>4 Q. Mr. Esobe, I'm going to come around</p> <p>5 behind you.</p> <p>6 A. That's okay. That's fine.</p> <p>7 MS. CUSACK: Can you see that?</p> <p>8 THE WITNESS: Yeah.</p> <p>9 Q. Now, I represent to you, sir, that this</p> <p>10 still frame is from video monitoring of F block at</p> <p>11 the Northern New Hampshire Correctional Facility</p> <p>12 at 4:20 and 19 seconds on August 24th, 2012.</p> <p>13 MS. CUSACK: And the camera is Channel</p> <p>14 30 --</p> <p>15 MR. KING: Yes.</p> <p>16 MS. CUSACK: -- for the record.</p> <p>17 MR. KING: Yes.</p> <p>18 THE WITNESS: Channel 30.</p> <p>19 Q. BY MR. KING: Now, on the left-hand side</p> <p>20 of the screen (indicating) you will see a line of</p> <p>21 bunks.</p> <p>22 A. Um-hum.</p> <p>23 Q. Is that correct?</p>	<p style="text-align: right;">Page 17</p> <p>1 just, like I said earlier, looking for something</p> <p>2 that is not right so we can correct it, because --</p> <p>3 (Reporter interrupts.)</p> <p>4 A. Looking for something that is not right,</p> <p>5 to correct it, to make it right.</p> <p>6 Q. Okay. And when you would walk past bunks</p> <p>7 such as these in the dayroom, you could see any</p> <p>8 activity on the upper bunk; is that right?</p> <p>9 A. Yeah, you can see it.</p> <p>10 Q. Okay.</p> <p>11 A. If there is any activity going on, yeah.</p> <p>12 But if there is not, then there's nothing to look.</p> <p>13 There is nothing to see.</p> <p>14 Q. If you were to detect an inmate sleeping</p> <p>15 on a bunk in the dayroom during the day, would you</p> <p>16 take any steps to make sure the inmate was okay?</p> <p>17 A. If the inmate is sleeping, I will walk</p> <p>18 around him. What am I checking? I'm checking</p> <p>19 bloodstain, blood. If he's okay, if he's looking</p> <p>20 like he's sleeping sound, then I will walk by him</p> <p>21 because -- yeah.</p> <p>22 Q. Okay. Okay. I'm going to start showing</p> <p>23 you the video.</p>

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1 A. Oh, this is a video of --  
 2 Q. Yes. Yes. And this is again video taken  
 3 of F block on August 24th, 2012, from Camera 30  
 4 beginning at 4:20 p.m. and 19 seconds.  
 5 A. Okay.  
 6 (Video played.)  
 7 Q. Now I've stopped the video at 4:20 and 28  
 8 seconds.  
 9 A. Yeah.  
 10 Q. Did you see, Mr. Esobe, an inmate just  
 11 emerge from a cell and collapse to the ground?  
 12 A. Yeah. I just saw that now, yeah.  
 13 Q. Okay. If you had seen such activity  
 14 while you were monitoring F block in CP-5 on  
 15 August 24th, 2012, --  
 16 A. Yeah.  
 17 Q. -- what, if anything, would you have  
 18 done?  
 19 A. If my camera was pointing there, like I  
 20 was in Channel 30 looking at it and I see that, I  
 21 will call the first responders. But if my camera  
 22 is different channel, for example, Channel -- a  
 23 different channel from Channel 30, I would have

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1 missed that. And it's not really something that  
 2 would get officer's attention. You know, like  
 3 when you're watching on the camera, that thing  
 4 happened really fast there. So it's like, yeah,  
 5 you move cameras every seconds.  
 6 Q. Okay.  
 7 A. So if my camera is right there, I would  
 8 have seen it, and I would have sent some officers  
 9 to go check what is going on.  
 10 (Video played.)  
 11 Q. Now, we've stopped the video at 4:21 and  
 12 13 seconds. Can you tell us what you observed on  
 13 the segment of video that we just watched?  
 14 A. Just right now?  
 15 Q. Yes.  
 16 A. Well, the -- I see some -- the inmate's  
 17 laying down on the bed there (indicating), right?  
 18 Q. Yes.  
 19 A. Some other inmates are around it, but  
 20 there's nothing like a physical fight or anything.  
 21 Just almost not too bad.  
 22 Q. Okay.  
 23 A. Yeah.

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1 Q. Okay. Well, when you were watching the  
 2 segment of video that you just saw, did you see --  
 3 strike that.  
 4 When you were watching the segment of  
 5 video that we just saw, the segment began with an  
 6 inmate collapsed on the floor, correct?  
 7 MS. CUSACK: Objection to form. Go  
 8 ahead.  
 9 A. I saw that.  
 10 Q. Yes.  
 11 A. But that happened -- like I said before,  
 12 it happened really quick, yeah. If I was like and  
 13 probably watching --  
 14 MS. CUSACK: Can I just stop for a  
 15 second, Ben? You're going to need to move,  
 16 because she needs to watch his lips too --  
 17 MR. KING: Oh, okay.  
 18 MS. CUSACK: -- to see what he's saying.  
 19 So she can't get down what he's saying if you're  
 20 standing in between them.  
 21 MR. KING: Okay.  
 22 MS. CUSACK: Thank you. I think he  
 23 finished, yeah.

Page 21

1 Q. BY MR. KING: And then did you see  
 2 another inmate help up the inmate who had  
 3 collapsed to the floor?  
 4 A. Yeah, I saw that.  
 5 Q. And then --  
 6 A. Well, what I -- you mean I saw that now?  
 7 Q. Yes.  
 8 A. Yes. I saw that now on this video, yup.  
 9 Q. Okay. And then you saw that inmate, who  
 10 helped the inmate who collapsed up, guide that  
 11 inmate to the bunk, right?  
 12 A. Yes, I saw that.  
 13 Q. Okay. And you saw the inmate who had  
 14 collapsed try to get up on the upper bunk and then  
 15 be pushed onto the upper bunk by another inmate,  
 16 correct?  
 17 A. Yes.  
 18 MS. CUSACK: Objection to form. Go  
 19 ahead.  
 20 A. I saw that. But he didn't really push  
 21 him. But, yeah, sort of like happened and the  
 22 inmate probably didn't really push him. I don't  
 23 know. Maybe I saw different. I don't know.

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1 Q. Now, I know that you were not doing  
2 rounds on this particular day. But if you had  
3 been doing rounds, you would have checked on the  
4 inmate lying in the upper bunk; is that correct?  
5 A. Yes. It depends what you mean by  
6 checking. Well, what we do, we don't really go  
7 pushing them around when they are sleeping. We  
8 walk around them, check for blood drippings and --  
9 yeah, that's what we check. And if it seems like  
10 he's okay, then he's good. If he didn't --  
11 Q. But you would have checked -- I didn't  
12 mean to cut you off.  
13 A. Yeah, I would have checked. Yeah, I  
14 would have checked.  
15 Q. You would have checked for things like  
16 blood and vomit and feces, right?  
17 A. Yeah, we will check that. But if it's  
18 okay, then we are good.  
19 Q. Okay. Now, if you had been viewing this  
20 video screen in CP-5 and you had seen one inmate  
21 pushing another inmate into a bunk, would you have  
22 done anything in response to seeing that?  
23 MS. CUSACK: Objection to form. Go

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1 ahead.  
2 A. Yes. Like I said before, if my camera  
3 was focused on that, yeah, then I will send some  
4 officers to check, check it, make sure everything  
5 is good.  
6 Q. Okay.  
7 A. Because I can't leave bubble. I can't  
8 leave control room. I have to do med calls and  
9 send some officers to, you know, take a look, see  
10 what is going on. That's what we do.  
11 Q. All right. Thank you.  
12 MS. CUSACK: Are you through with this?  
13 MR. KING: Yes.  
14 MS. DOUGLASS: Mr. Esobe, can you just --  
15 thank you.  
16 MS. CUSACK: You need this?  
17 THE WITNESS: Sorry.  
18 (Laptop proffered.)  
19 Q. BY MR. KING: Now, Mr. Esobe, when you  
20 were working in CP-5 and you were monitoring  
21 activity in housing blocks, you had the  
22 opportunity to view each housing block from one of  
23 two camera angles; is that right?

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1 A. Correct.  
2 Q. Okay. So you and I just finished  
3 reviewing video footage of F block beginning at  
4 approximately 4:20 p.m. from Camera Angle 30.  
5 A. Um-hum.  
6 Q. Now we are going to view video footage  
7 of the same housing block, same day, same time,  
8 from the other camera angle, Channel 29.  
9 (Video played.)  
10 Q. What did you see in the footage from  
11 Camera Angle 29, sir?  
12 A. I think is the same thing; is just, you  
13 know, another different angle. It's the same  
14 thing we just reviewed, yup.  
15 Q. And if you had observed the footage that  
16 we just viewed from Camera Angle 29 when you were  
17 working in CP-5 on August 24th, 2012, what, if  
18 anything, would you have done?  
19 A. Like I said, if my camera was on that 29  
20 or 30 and I see that, I would have sent in some  
21 officers to check it. But if my camera is  
22 somewhere else or maybe my boss is talking to me  
23 on the phone, I wasn't -- I'm just paying

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1 attention but answering calls. Because my boss  
2 sometimes calls me. There's meds going on.  
3 There's all kinds of stuff, phone ringing for us,  
4 yeah. So if I'm watching it and I saw that on  
5 some camera, I would send in some officers to  
6 check.  
7 Q. Okay. Sir, when did your employment at  
8 the Northern New Hampshire Correctional Facility  
9 end?  
10 A. When what? Sorry.  
11 Q. When did your employment here at the  
12 Northern New Hampshire Correctional Facility end?  
13 A. That would be in 2013 I believe. Can't  
14 remember dates very well. It's been very long.  
15 Q. Yeah. Did you leave employment here  
16 voluntarily or were you terminated?  
17 MS. CUSACK: Objection to form. Go  
18 ahead.  
19 A. Yeah, I just -- I left on my own my  
20 position.  
21 Q. Why did you leave employment here?  
22 A. Personal reasons.  
23 Q. The video clips that we've watched

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1 together here at this deposition, did you ever see  
2 them before today?  
3 **A. Yeah, I saw them with my attorneys.**  
4 **Q. And when you say your attorneys, are you**  
5 **referring to Attorney Cusack and Attorney**  
6 **Fredericks?**  
7 **A. Yes.**  
8 **Q. So you saw the video clips relatively**  
9 **recently?**  
10 **A. Yes.**  
11 **Q. Did anyone go over video evidence of what**  
12 **happened in F block on August 24th, 2012, with you**  
13 **in 2012?**  
14 **A. No.**  
15 **Q. Back in 2012 were you ever interviewed by**  
16 **anyone as part of a review of the assault that**  
17 **happened here on Jonathan Leite on August 24th,**  
18 **2012?**  
19 **A. No.**  
20 **Q. Sir, I believe you said earlier in your**  
21 **testimony that when you were doing rounds, if you**  
22 **saw something wrong, you would take care of it; is**  
23 **that right?**

Page 27

1 **A. Yes.**  
2 **Q. What exactly would you do if you saw**  
3 **something improper when you were doing rounds?**  
4 **MS. CUSACK: I'm going to object to the**  
5 **form, but go ahead.**  
6 **A. I will -- I will call first responders if**  
7 **it's serious case like physical fights or -- yeah,**  
8 **I will call first responders. But if it's, you**  
9 **know, not serious case, I will send in some**  
10 **officers to check it out first.**  
11 **Q. Was there ever an incident while you were**  
12 **doing rounds as a corrections officer here where**  
13 **you called first responders?**  
14 **A. No, but there was an incident where some**  
15 **other officers called for first responders, not**  
16 **me. But I was doing rounds with them, and they**  
17 **saw something that is not right. They called**  
18 **first responders. That time I was being trained,**  
19 **like following them, learning from them. I**  
20 **couldn't do anything on my own that time.**  
21 **Q. Understood.**  
22 **A. Yeah.**  
23 **Q. Understood. When was it that you were**

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1 being trained here?  
2 **A. I got a little bit of training before**  
3 **here for like, I can't remember, few months before**  
4 **I went to the academy. And after the academy I**  
5 **came back out with new COs, not just me. Like**  
6 **three of us from the academy that made it, they**  
7 **placed us in training as well, like supervising**  
8 **kind of with somebody, learning how to do the job.**  
9 **Q. Was that incident you were just recalling**  
10 **where correctional officers who were training you**  
11 **called first responders during rounds, did that**  
12 **happen here?**  
13 **A. It happened here, yeah.**  
14 **Q. So that would have happened sometime in**  
15 **2012?**  
16 **A. Sometime, but not this case you're**  
17 **talking about now.**  
18 **Q. I see.**  
19 **A. Different -- different thing. Because in**  
20 **prison, all kinds of stuff happen similar to that.**  
21 **Q. The incident that you're thinking of**  
22 **would have happened earlier in time than August of**  
23 **2012, right?**

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1 **MS. CUSACK: Objection to form. Go**  
2 **ahead.**  
3 **A. I can't remember very much. It's been**  
4 **very long time. But, yeah, sometimes, yeah, they**  
5 **do -- do drills too, so we can see how it's done,**  
6 **some who are on training, for training purposes.**  
7 **Q. Okay.**  
8 **A. Yeah.**  
9 **Q. I see.**  
10 **MR. KING: All right. Off the record for**  
11 **a moment.**  
12 **(Discussion off the record.)**  
13 **MR. KING: Back on the record. We just**  
14 **had a discussion on the record -- off the record**  
15 **rather about assuring Mr. Esobe's attendance at**  
16 **trial, given that he is a former employee of the**  
17 **Northern New Hampshire Correctional Facility and**  
18 **given that I am not asking him to reveal his**  
19 **address on the record for security purposes. And**  
20 **Attorney Cusack has represented that if we need**  
21 **Mr. Esobe's attendance at trial, we can serve a**  
22 **subpoena upon the Attorney General's Office, and**  
23 **the Attorney General's Office will accept service**



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1 on behalf of Mr. Esobe. Is that accurate?  
2 MS. CUSACK: That is accurate.  
3 MR. KING: Okay. I have nothing further.  
4 MS. CUSACK: I have nothing.  
5 (Deposition concluded at 11:05 a.m.)  
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1 CERTIFICATE OF WITNESS  
2  
3 I, Ejike Esobe, have read the foregoing  
4 transcript of deposition taken on Wednesday,  
5 September 20, 2017, at the Northern NH  
6 Correctional Facility, Berlin, New Hampshire, and  
7 do hereby swear/affirm it is an accurate and  
8 complete record of my testimony given under oath  
9 in the matter of Leite v. Goulet, et al.,  
10 including any and all corrections that may appear  
11 on those pages denoted as "Corrections."  
12  
13  
14 \_\_\_\_\_  
15 Ejike Esobe  
16 STATE OF \_\_\_\_\_  
17 COUNTY OF \_\_\_\_\_  
18 Subscribed and sworn to before me this \_\_\_\_\_ day  
19 of \_\_\_\_\_, 2017.  
20  
21  
22 Notary Public \_\_\_\_\_ J.P. \_\_\_\_\_  
23 My Commission Expires: \_\_\_\_\_

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1 CORRECTION AND SIGNATURE PAGE  
2 DEPOSITION: Ejike Esobe  
3 DATE OF DEPOSITION: September 20, 2017  
4 PAGE LINE NOW READS SHOULD READ  
5 \_\_\_\_\_  
6 \_\_\_\_\_  
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20 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2017.  
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22  
23 \_\_\_\_\_  
Ejike Esobe

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1 C E R T I F I C A T E  
2 I, Celeste A. Quimby, a Licensed Court  
3 Reporter of the State of New Hampshire, do hereby  
4 certify that the foregoing is a true and accurate  
5 transcript of my stenographic notes of the  
6 deposition of Ejike Esobe, who was first duly  
7 sworn, taken at the place and on the date  
8 hereinbefore set forth.  
9 I further certify that I am neither attorney  
10 nor counsel for, nor related to or employed by any  
11 of the parties to the action in which this  
12 deposition was taken, and further that I am not a  
13 relative or employee of any attorney or counsel  
14 employed in this case, nor am I financially  
15 interested in this action.  
16 THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT  
17 DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME BY  
18 ANY MEANS UNLESS UNDER THE DIRECT CONTROL AND/OR  
19 DIRECTION OF THE CERTIFYING REPORTER.  
20  
21  
22  
23 CELESTE A. QUIMBY, LCR No. 17